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By: MICHELLE BANKS-SPEARMAN (7540)
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UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
(CAMDEN VICINAGE)

In re:	:	Case No. 24-11039-ABA
SHIRLEY SIMPSON	:	Chapter 13
	:	
Debtor (s)	:	OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

TO: CLERK, U.S. BANKRUPTCY COURT
ANDREW B. FINBERG, TRUSTEE
ROBERT BRAVERMAN, DEBTOR'S COUNSEL

The City of Camden "Camden" objects to debtor's Chapter 13 Plan for the following reasons:

1. Debtor's Plan fails to provide for the payment of the City's secured claim for unpaid taxes, CCMUA, sewer and water charges owed against 2026 Miller Street in the amount of \$258,018.60 which amount included estimated interest over the life of a 60-month Plan at rate of the statutory rate of 18%. A copy of the proof of claim is on file with the Court as Claim #12.
2. Debtor's plan fails to meet the confirmation standard set forth in 11 U.S.C. §1325(a)(2)(B) because the City has not accepted the Plan and the Plan does not provide for the City to retain the lien securing such claims until the earlier of (aa) the payment of the underlying debt determined under the non-bankruptcy law or (bb) discharge under section 1328.
3. Debtor's plan does not comply with 11 U.S.C. §1325(a)(2)(B) because the value of the property to be distributed under the plan is less than the allowed amount of the City's claims.

4. The City will withdraw its objection in the event the Debtor's Chapter 13 Plan is modified to provide for payment in full of the City's claims as follows:

Claim #	Address	Claim Amount	Date filed
12	2026 Miller Street	\$258,018.60	04/18/2024

WHEREFORE, the City of Camden prays that the plan of reorganization not be confirmed and that this Chapter Thirteen petition be dismissed unless said plan of reorganization is modified to comply with the aforementioned deficiencies.

DANIEL S. BLACKBURN
City Attorney

Date: 04/19/2024

By: /s/ Michelle Banks-Spearman
MICHELLE BANKS-SPEARMAN
Assistant City Attorney